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8 PRECISION VALVE & AUTOMATION, INC.

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11

12
13 RUBEN JUAREZ, an individual and
14 ISELA HERNANDEZ, an individual,

15 Plaintiffs,

16
17 PRECISION VALVE &
18 AUTOMATION, INC., a corporation
and DOES 1-20,

19
20 Defendants.

CASE NO. CV17-03342-ODW (GJSX)
[L.A.S.C. Case No. BC650229]

**DECLARATION OF DAVID HWANG IN
SUPPORT OF DEFENDANT
PRECISION VALVE & AUTOMATION,
INC.'S MOTION FOR SUMMARY
JUDGMENT**

Date: September 24, 2018
Time: 1:30 p.m.
Ctm: 5D, 5th Floor
Judge: Hon. Otis D. Wright II

*This motion is made following the
conference of counsel pursuant to L.R. 7-3
which took place on July 16, 2018. (Catalona
Dec., ¶ 57, Ex. 57.)

**Defendant requests oral argument on this
motion for summary judgment.

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1 I, David Hwang, declare,

2 1. I have personal knowledge of the following facts and could competently
3 testify to those facts if called as a witness.

4 2. I was employed at Space Explorations Technologies Corp., known as
5 "SpaceX," in Hawthorne, California from January 2012 to February, 2014. At SpaceX, I
6 served as an Avionics Materials Engineer. My office was located on the third floor of the
7 main building in the Hawthorne complex. The sole conformal coating machine at SpaceX
8 at that time, the PVA 350, was located down the hallway from my office. My role as
9 Avionics Materials Engineer was to determine which coatings to use and the application
10 requirements for those materials to meet specific requirements. In this role, I interacted
11 with the technicians who were responsible for programming and operating the PVA 350
12 approximately two to three times per week, and I have witnessed the PVA 350 in
13 operation. During my employment at SpaceX, I also became familiar with Ruben Juarez
14 who was one of the technicians who worked in the Avionics Department.

15 3. As provided in SpaceX's standard operating procedures, employees
16 operating the equipment were required to follow the product manufacturer's specifications
17 and operating instructions which were maintained by SpaceX at its Hawthorne campus. I
18 authored portions of one of these standard operating procedures which was entitled
19 "Avionics Standard Operating Procedure: Polymeric Application on Electronic
20 Assemblies." Every employee in the Avionics Department had access to this Standard
21 Operating Procedure when it was released. Attached to this declaration as Exhibits 75-77
22 are true and correct copies of relevant portions of this Standard Operating Procedure. As
23 shown on the cover page, Exhibit 75 is Revision A, dated June 8, 2012, Exhibit 76 is
24 Revision B, dated August 17, 2012, and Exhibit 77 is Revision C, dated May 17, 2013.
25 These documents contained SpaceX's instructions for operating the PVA 350 in addition
26 to other equipment in the Avionics Department.

27 4. SpaceX maintained copies of MSDS sheets for all chemicals it used
28 including Humiseal, Humiseal thinner and Arathane materials. These were kept in hard

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1 copy form in binders in every manufacturing area, and on SpaceX's intranet site which
 2 was easily accessible by every SpaceX employee including Ruben Juarez. One of the
 3 binders of MSDS sheets was kept in the conformal coating lab or immediately adjacent to
 4 the lab.

5 5. Attached hereto as Exhibit 79 are true and correct copies of a selection of
 6 emails sent to or by me in the time period of March, 2012 through May, 2012. These
 7 emails show that on March 13, 2012 I provided Bill Burns at REStronics with a
 8 specification for Arathane 5750. After this, PVA did a presentation with a PVA 650 using
 9 Arathane 5750. Then in early May, 2012, I contacted PVA about adding new components
 10 to the PVA 350 in order to use Arathane materials with the PVA 350. To the best of my
 11 knowledge, SpaceX began using Arathane materials in the PVA 350 in this time frame
 12 and I do not believe those materials were used in the machine prior to March, 2012.

13 6. I declare under penalty of perjury under the laws of the United States of
 14 America that the foregoing facts are true and correct. Executed on

15 July 30,, 2018 in Buena Park, California.

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 18 
 19 David Hwang
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 21

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 24 Schweitzer

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